



CTIA

Building The Wireless Future™

Cellular Telecommunications Industry Association

September 17, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, Southwest
12th Street Lobby, TW-A325
Washington, DC 20554

Re: *Ex Parte* Presentation
CC Docket No. 94-102

Dear Ms. Dortch,

On September 17, 2002, the Cellular Telecommunications & Internet Association (CTIA) represented by Michael Atlschul, Senior Vice President for Policy and Administration, Diane Cornell, Vice President for Regulatory Policy, and Christopher Day, Staff Counsel, along with Ben Almond, Cingular Wireless, Laura Holloway, Nextel Communications, Mark Rubin, Western Wireless, Luisa Lancetti, Sprint PCS, Doug Brandon, AT&T Wireless Systems, Fran Malnati, Verizon Wireless, Bob Kirk, Wilkinson Barker Knauer, Bob Calaff, T-Mobile USA, Sean O'Hara, Dobson Cellular Systems, William J. Todd, TeleCommunication Systems, Jennifer Tatel, Sidley Austin Brown & Wood, Martha Jenkins, Intrada, Inc., and John Kuykendall, Kraskin Lesse & Cosson, met with Joel Taubenblatt, Jane Phillips, Martin Liebman, Barry Ohlson, Blaise Scinto, Patrick Forster, Daniel Grosh, and Jennifer Salhus of the Wireless Telecommunications Bureau.

At the meeting, the industry participants discussed the fact that many LEC providers of ALI services are still not ready to provide necessary Phase II services. In addition, the participants noted that certain LECs now are seeking to charge wireless carriers for ALI services, in violation of the Commission's Order in the *King County* case. In particular, the parties discussed the material in the attached presentation.

In order to resolve these matters, the participants requested that the Commission amend Section 20.28(j) of the Commission's rules to state that wireless carriers shall begin delivering Phase II data within six months of the PSAP request or within 120 days after a PSAP is in fact capable of receiving or using the Phase II data, whichever is later.

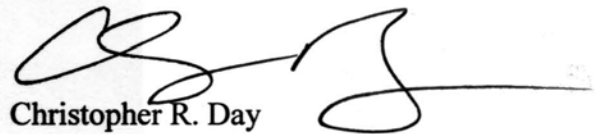


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The participants also asked the Commission to confirm the fact that the *King County* decision allocates ALI costs to PSAPs, and also requested that the Commission order LECs to finish ALI database upgrades without further delay. Finally, the participants urged the Commission to clarify that LEC provisioning delays constitute a defense to any enforcement actions taken against a wireless carrier for failure to meet Phase II deadlines.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to be 'Christopher R. Day', with a long horizontal line extending to the right.

Christopher R. Day